

Incident Report

Completed by: Boone Brothers

Date: April 21, 2020

Location of Incident: BD
1211 Mary Magnan Blvd.
Madison, Georgia 30650

Release Point: Line 3 Vessel Room

Date of Incident: April 19, 2020

Description of Incident:

On April 19, 2020, around 1:50 pm, the RTO went off-line. Shortly thereafter, a baseline alarm for EtO located in the maintenance shop alerted personnel of a potential release. The sensor reading indicated 5.59 ppm. Based on the investigation below, estimated worst-case fugitive emissions from the release is 0.004 pounds.

Background:

There is a four-inch duct which serves a small fume hood in the maintenance shop. This has a slide gate valve which usually remains closed unless in use. This duct is connected to the same system that pulls air from the aeration cells which is routed to the RTO.

Root Cause Investigation:

The investigation revealed that the RTO went off-line because it did not have enough air to sustain combustion. Construction debris from recent emission control upgrades had built up on the air filters and were finally clogged when heavy rains provided a significant source of humidity. When the RTO went off-line, the slide gate valve at the fume hood was in an open position due to operator error, providing a temporary path for aeration air from the duct to backflow into the maintenance shop.

The open valve was closed by maintenance when discovered during the investigation. Mechanics also repaired the air filtration apparatus. When operators resumed the process, the remainder of the contents in the duct were processed through the RTO.

Corrective Actions

The following steps were taken as corrective action:

1. Air filter will be fitted with a pre-filter and inspected weekly
2. Verify the maintenance technicians keep the valve closed when hood is not in use